

January 2, 2025

Hon. Vera M. Scanlon
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 10007

Re: **Artec Europe S.À R.L., v. Shenzhen Creality 3D Tech Co., Ltd, et al.**
Case No. 1:22-1676 (OEM)(VMS)

Dear Judge Scanlon:

Pursuant to the Court's December 11, 2024 Order, Plaintiff Artec Europe S.à.r.l. ("Artec") and Defendants Shenzhen Creality 3D Tech. Co., Ltd. and Shenzhen Jimuyida Technology Co., Ltd. (collectively, "Defendants") file this letter addressing the status of discovery and the current schedule.

The parties have met and conferred to address outstanding discovery issues. The parties believe an extension of the close of discovery until February 28, 2025 would be appropriate and will allow the parties time to alleviate various disputes. In particular, Artec has sought to depose two witnesses located in Mainland China. Mainland China does not allow for depositions. As such the parties are negotiating logistics regarding such witnesses traveling internationally for the purposes of providing deposition testimony. The parties are discussing potential dates, location and expenses associated with international travel for such witnesses. In addition, the extension will alleviate the concerns with respect to disputes regarding the production of financial information and allow for additional cooperation among the parties regarding the production of source code. The parties further believe the requested extension will also provide an opportunity for settlement and are discussing a proposed mediation.

There are two motions pending. Artec has filed a motion for a protective order that remains pending. D.I. 130. Defendants have filed a motion to compel that remains pending. D.I. 131. Defendants' motion has been substantively resolved based on Artec's agreement to confer regarding source code production next week, its agreement to provide dates for noticed witnesses and its agreement to provide the requested financial information. D.I. 133. Defendants' request for costs and fees associated with their motion remains pending. D.I. 133.



Respectfully,

/s/ Richard de Bodo

Richard de Bodo

CA State Bar No. 128199

2029 Century Park East, Suite 400n

Los Angeles, CA 90067

Tel: (310) 943-7301

richard.debodo@rimonlaw.com

John E. Handy

1765 Greensboro Station Place Tower I

Suite 900

McLean, VA 22102

Tel/Fax: (703) 559-7360

john.handy@rimonlaw.com

cc: All counsel of record via ECF